



Louisville Metro Air Pollution Control District  
701 West Ormsby Avenue, Suite 303  
Louisville, Kentucky 40203-3137



## Federally Enforceable District Origin Operating Permit (FEDOOP)

Permit No.: O-0808-20-F

Plant ID: 0808

Effective Date: 02/26/2021

Expiration Date: 02/26/2026

Permission is hereby given by the Louisville Metro Air Pollution Control District to operate the process(es) and equipment described herein which are located at:

**Source:** D.D. Williamson & Co., Inc.  
1901 Payne Street  
Louisville, KY 40206

**Owner:** D.D. Williamson & Co., Inc.  
1901 Payne Street  
Louisville, KY 40206

The applicable procedures of District Regulation 2.17 regarding review by the U.S. EPA and public participation have been followed in the issuance of this permit. Based on review of the application on file with the District, permission is given to operate under the conditions stipulated herein. If a renewal permit is not issued prior to the expiration date, the owner or operator may continue to operate in accordance with the terms and conditions of this permit beyond the expiration date, provided that a complete renewal application is submitted to the District no earlier than twelve months and no later than ninety days prior to the expiration date.

Emission limitations to qualify for non-major status:

Pollutant:	SO <sub>2</sub>	PM/PM <sub>10</sub>
Tons/year:	< 25 tpy	< 25 tpy

Application No.: See **Application and Related Documents** table.

Public Notice Date: 01/20/2021

Permit writer: Aaron DeWitt

DocuSigned by:

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Air Pollution Control Officer  
2/26/2021

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**Permit Revisions and Changes**

<b>Permit No.</b>	<b>Public Notice Date</b>	<b>Issue Date</b>	<b>Change Type</b>	<b>Description/Scope</b>
128-01-F	06/03/2001	11/05/2001	Initial	Initial Permit Issuance
O-0808-15-F	12/12/2015	01/19/2016	Renewal	Permit Renewal; Removed equipment taken out of service; Incorporated Construction Permits
O-0808-20-F	01/20/2021	02/26/2021	Renewal	Permit Renewal; Administrative corrections

**Application and Related Documents**

<b>Document Number</b>	<b>Date</b>	<b>Description</b>
161671	08/05/2020	FEDOOP expiration reminder
176900	11/04/2020	Operating application for FEDOOP renewal
176994	11/05/2020	Administratively complete letter
177407	11/11/2020	IA equipment emission question
177501	11/13/2020	D.D. Williamson response to IA equipment emission question
181163	01/04/2021	Draft permit for company review
194004	01/19/2021	Draft permit for public comment

## Abbreviations and Acronyms

AP-42	- AP-42, <i>Compilation of Air Pollutant Emission Factors</i> , published by U.S.EPA
APCD	- Louisville Metro Air Pollution Control District
BAC	- Benchmark Ambient Concentration
BACT	- Best Available Control Technology
Btu	- British thermal unit
CEMS	- Continuous Emission Monitoring System
CFR	- Code of Federal Regulations
CO	- Carbon monoxide
District	- Louisville Metro Air Pollution Control District
EA	- Environmental Acceptability
gal	- U.S. fluid gallons
GHG	- Greenhouse Gas
HAP	- Hazardous Air Pollutant
Hg	- Mercury
hr	- Hour
in.	- Inches
lbs	- Pounds
l	- Liter
LMAPCD	- Louisville Metro Air Pollution Control District
mmHg	- Millimeters of mercury column height
MM	- Million
(M)SDS	- (Material) Safety Data Sheet
NAICS	- North American Industry Classification System
NO <sub>x</sub>	- Nitrogen oxides
PM	- Particulate Matter
PM <sub>10</sub>	- Particulate Matter less than 10 microns
PM <sub>2.5</sub>	- Particulate Matter less than 2.5 microns
ppm	- parts per million
PSD	- Prevention of Significant Deterioration
psia	- Pounds per square inch absolute
QA	- Quality Assurance
RACT	- Reasonably Available Control Technology
SIC	- Standard Industrial Classification
SIP	- State Implementation Plan
SO <sub>2</sub>	- Sulfur dioxide
STAR	- Strategic Toxic Air Reduction
TAC	- Toxic Air Contaminant
UTM	- Universal Transverse Mercator
VOC	- Volatile Organic Compound
w.c.	- Water column
year	- Any period of twelve consecutive months, unless "calendar year" is specified
yr	- Year, or any 12 consecutive-month period, as determined by context

## **Preamble**

This permit covers only the provisions of Kentucky Revised Statutes Chapter 77 Air Pollution Control, the regulations of the Louisville Metro Air Pollution Control District (District) and, where appropriate, certain federal regulations. The issuance of this permit does not exempt any owner or operator to whom it has been issued from prosecution on account of the emission or issuance of any air contaminant caused or permitted by such owner or operator in violation of any of the provisions of KRS 77 or District regulations. Any permit shall be considered invalid if timely payment of annual fees is not made. The permit contains general permit conditions and specific permit conditions. General conditions are applicable unless a more stringent requirement is specified elsewhere in the permit.

## **General Conditions**

- G1. The owner or operator shall comply with all General Conditions herein and all terms and conditions in the referenced process/process equipment list.
- G2. All terms and conditions in this FEDOOP are enforceable by EPA, except those terms and conditions specified as District-only enforceable, and those which are not required pursuant to the Clean Air Act Amendments of 1990 (CAAA) or any of the Act's applicable requirements.
- G3. All application forms, reports, compliance certifications, and other relevant information submitted to the District shall be certified by a responsible official. If a change in the responsible official (RO) occurs during the term of this permit, or if an RO is added, the owner or operator shall provide written notification (Form AP-100A) to the District within 30 calendar days of such change or addition.
- G4. The owner or operator shall submit an annual compliance certification, signed by the responsible official, to the District, on or before April 15 of the year following the year for which the certification applies. This certification shall include completion of District Form 9440-O.
- G5. Periodic testing, instrumental monitoring, or non-instrumental monitoring, which may include record keeping, shall be performed to the extent necessary to yield reliable data for purposes of demonstrating continuing compliance with the terms and conditions of this permit.
- G6. The owner or operator shall retain all records required by the District or any applicable requirement, including all required monitoring data and supporting information, for a period of five years from the date of the monitoring, sampling, measurement, report, or application, unless a longer time period for record retention is required by the District or an applicable requirement. Records shall be retrievable within a reasonable time and made available to the District, Kentucky Division for Air Quality, or the EPA upon request.
- G7. The owner or operator shall provide written notification to the District, and receive approval, prior to making any changes to existing equipment or processes that would result in emissions of any regulated pollutant in excess of the allowable emissions specified in this permit.
- G8. This permit may be reissued, revised, reopened, or revoked pursuant to District Regulation 2.17. Repeated violations of permit conditions are sufficient cause for revocation of this permit.

The filing of a request by the owner or operator for any reissuance, revision, revocation, termination, or a notification of planned changes in equipment or processes, or anticipated noncompliance shall not alter any permit requirement.

- G9. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed either 5 tons per year, or such lesser quantity as the EPA has established by rule, of any one Hazardous Air Pollutant (HAP) or 12.5 tons per year of all HAPs combined. Fugitive HAP emissions shall be included in this limit. HAPs are listed in section 112(b) of the CAAA and as amended in 40 CFR 63, Subpart C.
- G10. Except as otherwise specified or limited herein, the owner or operator shall not allow or cause the emissions to equal or exceed 25 tons per year of any regulated pollutant, including particulate matter, PM<sub>10</sub>, PM<sub>2.5</sub>, sulfur dioxide, carbon monoxide, nitrogen oxides, lead, hydrogen sulfide, gaseous fluorides, total fluorides, or Volatile Organic Compounds (VOC); any pollutant subject to any standard in District Regulation 7.02; or any substance listed in sections 112(r), 602(a) and 602(b) of the CAAA. Fugitive emissions shall be included in these limits for source categories listed in District Regulation 2.16.
- G11. Unless specified elsewhere in this permit, the owner or operator shall complete required monthly record keeping within 30 days following the end of each calendar month.
- G12. Unless specified elsewhere in this permit, the owner or operator shall submit semi-annual reports demonstrating compliance with the emission limitations specified. The report shall contain monthly and consecutive 12-month totals for each pollutant that has a federally enforceable limitation on the potential to emit. All reports shall include the company name, plant ID number, and the beginning and ending date of the reporting period. The compliance reports shall clearly identify any deviation from a permit requirement or a declaration that there were no such deviations. All compliance reports shall include the following per Regulation 2.17, section 3.5.
- A certification statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in this document are true, accurate, and complete", and
  - The signature and title of a responsible official of the company.

The semi-annual compliance reports are due on or before the following dates of each calendar year:

<b><u>Reporting Period</u></b>	<b><u>Report Due Date</u></b>
January 1 - June 30	August 29
July 1 - December 31	March 1 of the following year

- G13. The owner or operator shall comply with all applicable requirements of the following federally enforceable District Regulations:

<b>Regulation</b>	<b>Title</b>
1.01	General Application of Regulations and Standards

<b>Regulation</b>	<b>Title</b>
1.02	Definitions
1.03	Abbreviations and Acronyms
1.04	Performance Tests
1.05	Compliance With Emissions Standards and Maintenance Requirements
1.06	Source Self-Monitoring, Emission Inventory Development and Reporting
1.07	Excess Emissions During Startups, Shutdowns, and Upset Conditions
1.08	Administrative Procedures
1.09	Prohibition of Air Pollution
1.10	Circumvention
1.11	Control of Open Burning
1.14	Control of Fugitive Particulate Emissions
1.18	Rule Effectiveness
1.19	Administrative Hearings
2.01	General Application (Permit Requirements)
2.02	Air Pollution Regulation Requirements and Exemptions
2.03	Authorization to Construct or Operate; Demolition/Renovation Notices and Permit Requirements
2.06	Permit Requirements – Other Sources
2.09	Causes for Permit Modification, Revocation, or Suspension
2.10	Stack Height Considerations
2.11	Air Quality Model Usage
3.01	Ambient Air Quality Standards
4.01	General Provisions for Emergency Episodes
4.02	Episode Criteria
4.03	General Abatement Requirements
4.04	Particulate and Sulfur Dioxide Reduction Requirements
4.05	Hydrocarbon and Nitrogen Oxides Reduction Requirements
4.06	Carbon Monoxide Reduction Requirements
4.07	Episode Reporting Requirements
6.01	General Provisions (Existing Affected Facilities)
6.02	Emission Monitoring for Existing Sources
7.01	General Provisions (New Affected Facilities)

- G14. The owner or operator shall comply with all applicable requirements of the following District-only enforceable regulations:

<b>Regulation</b>	<b>Title</b>
1.12	Control of Nuisances
1.13	Control of Objectionable Odors
2.08	Emission Fee, Permit Fees and Permit Renewal Procedures
2.17	Federally Enforceable District Origin Operating Permits
5.00	Definitions
5.01	General Provisions
5.02	Adoption and Incorporation by Reference of National Emission Standards for Hazardous Air Pollutants
5.14	Hazardous Air Pollutants and Source Categories
5.15	Chemical Accident Prevention Provisions
5.20	Methodology for Determining Benchmark Ambient Concentration of a Toxic Air Contaminant
5.21	Environmental Acceptability for Toxic Air Contaminants
5.22	Procedures for Determining the Maximum Ambient Concentration of a Toxic Air Contaminant
5.23	Categories of Toxic Air Contaminants
7.02	Adoption and Incorporation by Reference of Federal New Source Performance Standards

- G15. The owner or operator shall submit emission inventory reports, as required by Regulation 1.06, if so notified by the District.
- G16. The owner or operator shall submit timely reports of abnormal conditions or operational changes that may cause excess emissions, as required by Regulation 1.07.
- G17. Applications, reports, test data, monitoring data, compliance certifications, and any other document required by this permit shall be submitted to:

***Air Pollution Control District  
701 W. Ormsby Avenue, Suite 303  
Louisville, Kentucky 40203-3137***



**Emission Unit U1: Caramel Coloring****Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
1.13	Control of Objectionable Odors in the Ambient Air	1,2,3
2.17	Federally Enforceable District Origin Operating Permits	All
7.09	Standards of Performance for New Process Gas Streams	1,4

**Equipment**

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Control ID</b>	<b>Release ID</b>
E1	Cooker #1 for liquid caramel coloring, make Eastern Tank Fabricators, capacity 2,200 gallons	1972	1.13, 7.09	C1	S1
E2	Cooker #2 for liquid caramel coloring, make General Industries, capacity 2,500 gallons	1957		C1	S1
E3	Cooker #3 for liquid caramel coloring with blowout tank, make Custom Products, capacity 4,500 gallons	1995		C1	S1
E4	Cooker #4 for liquid caramel coloring with blowout tank, make Eastern tank, model #5041-1, capacity 2,500 gallons	2004		C1	S1
E5	Caramel coloring cooker with a flash tank and vacuum jet, make Vendome Copper, capacity 50 gallons	2006		C1	S1

**Control Devices**

<b>Control ID</b>	<b>Description</b>	<b>Control Efficiency</b>
C1	Venturi type wet scrubber, make Heil Process Equipment, model 770-18	81.3% for SO <sub>2</sub> <sup>1</sup>

<sup>1</sup> On June 14 and 15, 2016, the source performed an EPA Reference Method 6 stack test on the venturi scrubber for SO<sub>2</sub> removal efficiency. The average SO<sub>2</sub> inlet emission rate was 1.52 lb/hr. The average SO<sub>2</sub> outlet emission rate was 0.23 lb/hr. This results in a control efficiency of 81.3% for SO<sub>2</sub>.

## U1 Specific Conditions

### S1. Standards

[Regulation 2.17, section 5.1]

#### a. Odor

No person shall emit or cause to be emitted into the ambient air any substance that creates an objectionable odor beyond the person's property line. An odor will be deemed objectionable when documented investigation by the District includes, as a minimum: observations on the odor's nature, intensity, duration, and location, and evidence that the odor causes injury, detriment, nuisance, or annoyance to persons or to the public. [Regulation 1.13, section 2.1]

#### b. SO<sub>2</sub>

- i. The owner or operator shall not allow the plantwide SO<sub>2</sub> emissions to equal or exceed 25 tons per 12 consecutive month period.  
[Regulation 2.17, section 5.1]
- ii. The owner or operator shall not cause or allow at an affected facility the release of a process gas stream containing sulfur dioxide with a concentration greater than 0.2863 grains/dscf at 0% excess oxygen.<sup>2</sup>  
[Regulation 7.09, Section 4]

### S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

#### a. Odor

- i. The owner or operator shall keep a log for odor complaints and results of a daily survey of odors conducted around the plant property line during normal process operation. For any odor complaints or any odorous events determined as a result of the daily odor surveys, the owner or operator shall maintain the following records:
  - (1) The date and time of the complaint or odorous event;
  - (2) A description of the nature of the complaint or odorous event, including the character, time and duration of the event and, if known, the wind direction at the time of the complaint;

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<sup>2</sup> The minimum control device efficiency needed to meet the concentration limitation of 0.2863 grains/dscf is 32% per the previous stack test on the venturi scrubber for SO<sub>2</sub> dated September 13 and 14, 2006. The June 14 and 15, 2016 stack tests showed that the control still meets these limits.

- (3) Summary information on any causes or reasons determined for each event,
  - (4) Corrective action taken to minimize the extent of each event, and
  - (5) Any measures implemented to prevent reoccurrence.
- ii. The owner or operator shall notify the District of any odor complaints within one business day of receiving the complaint.

**b. SO<sub>2</sub>**

- i. The owner or operator shall maintain monthly records of the quantity of caramel coloring manufactured during each calendar month.
- ii. The owner or operator shall monitor and record, during normal operation, once per day, that there is pump discharge pressure to the venturi wet scrubber to ensure it is  $\pm 10\%$  of 25.3 psi.<sup>3</sup>
- iii. The owner or operator shall monitor and record the vacuum of the venturi wet scrubber at least once per day to ensure it is at or between 1.5 and 6 inches water column.
- iv. If there is any time that the venturi wet scrubber is not in the proper range for the pump discharge pressure or vacuum, then the owner or operator shall keep a record of the following for each event:
  - (1) Date;
  - (2) Start time and stop time;
  - (3) Identification of the control device and process equipment;
  - (4) The observed pump discharge pressure or vacuum;
  - (5) Summary of the cause or reason for each event;
  - (6) Corrective action taken to minimize the extent or duration of the event; and
  - (7) Measure implemented to prevent reoccurrence of the situation that resulted in the event.
- v. The owner or operator shall, monthly, perform a visual inspection of the structural and mechanical integrity of the venturi wet scrubber for signs of damage, air leakage, corrosion, etc. and repair as needed.

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<sup>3</sup> The minimum pump discharge pressure average was 25.3 psi during the most recent performance tests on June 14 and 15, 2016. The range may be updated by a future performance test.

- vi. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month emissions of SO<sub>2</sub> for each calendar month, using the following methodology or other methods approved in writing by the District.

$$\text{Emissions (tons/month)} = \text{Throughput (lb Ammonia Bisulfite (ABS)/month)} \times \text{Amount remaining in product (\%)} \times \text{SO}_2 \text{ in ABS (\%)} \times (1 - \text{scrubber efficiency}) \times \text{ABS consumed in reactions (\%)} / 2000 \text{ (lb/ton)}$$

### S3. Reporting

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

#### a. Odor

- i. The owner or operator shall report:
- (1) The date and time of the complaint or odorous event;
  - (2) A description of the nature of the complaint or odorous event, including the character, time and duration of the event and, if known, the wind direction at the time of the complaint;
  - (3) Summary information on any causes or reasons determined for each event,
  - (4) Corrective action taken to minimize the extent of each event, and
- ii. The owner or operator shall identify all times the venturi wet scrubber (C1) exceeds the vacuum range and a description of any corrective action taken for each exceedance.
- iii. The owner or operator shall identify all times the pump discharge pressure to the venturi wet scrubber (C1) is outside of  $\pm 10\%$  of the values from the most recent performance test and a description of any corrective action taken for each exceedance.

**Emission Unit U2: Spray Drying****Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permits	All
7.08	Standards of Performance for New Process Operations	1, 2, 3.1, 3.2 and 3.3

**Equipment**

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Control ID</b>	<b>Release ID</b>
E6	Spray Dryer and three cooling cyclones, make Niro, model SD250, capacity 2,000 ton/hr	2003	7.08	C2	S2

**Control Devices**

<b>Control ID</b>	<b>Description</b>	<b>Control Efficiency</b>
C2	Wet Scrubber/De-mister, make Niro Nozzle 1 (18-24 gpm) Nozzle 2 & 3 (8-15 gpm) Nozzle 4 & 5 (5-10 gpm)	80% for PM <sup>4</sup>

<sup>4</sup> On June 15, 2016, the source performed an EPA Method 5 stack test on the wet scrubber outlet for a PM emission rate. The average PM outlet emissions were 1.49 lb/hr. The average PM inlet emissions were not tested. Assuming the District's pre-approved control efficiency for scrubbers of 80%, the PM inlet emissions are calculated to be 7.45 lb/hr.

## U2 Specific Conditions

### S1. Standards

[Regulation 2.17, section 5.1]

#### a. Opacity

The owner or operator of E6 shall not allow visible emissions to equal or exceed 20% opacity. [Regulation 7.08, section 3.1.1]

#### b. PM/PM<sub>10</sub>

- i. The owner or operator shall not allow the plantwide PM/PM<sub>10</sub> emissions to equal or exceed 25 tons per 12 consecutive month period. [Regulation 2.17, section 5.1]
- ii. The owner or operator shall not allow PM emissions from E6 to exceed 3.59 lb/hr per piece of equipment based on actual operating hours in a calendar day.<sup>5</sup> [Regulation 7.08, section 3.1.2]
- iii. The owner or operator shall operate and maintain the control device at all times an associated emission point is in operation, including periods of startup, shutdown, and malfunction, in a manner consistent with good air pollution control practice to meet the standards.

### S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

#### a. Opacity

- i. The owner or operator shall, monthly, conduct a one-minute visible emissions survey, during normal operation, of the emission points. No more than four emission points shall be observed simultaneously. The opacity surveys may be performed on the building exhaust points if the process is inside an enclosure.
- ii. At emission points where visible emissions are observed, the owner or operator shall initiate corrective action within eight hours of the initial observation. If the visible emissions persist, the owner or operator shall perform or cause to be performed a Method 9, in accordance with 40 CFR Part 60, Appendix A, within 24 hours of the initial observation.

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<sup>5</sup> A one-time PM compliance demonstration has been performed for this equipment on August 3, 2015, and the control device must be used to meet the 3.59 lb/hr standard.

- iii. The owner or operator shall, monthly, maintain records of the results of all visible emissions surveys and tests. Records of the results of any visible emissions survey shall include the date of the survey, the name of the person conducting the survey, whether or not visible emissions were observed, and what if any corrective action was performed. If an emission point is not being operated during a given month, then no visible emission survey needs to be performed and a negative declaration shall be entered in the record.

**b. PM/PM<sub>10</sub>**

- i. The owner or operator shall maintain monthly records of the type and quantity of products transferred.
- ii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month emissions of PM<sub>10</sub> for each calendar month, using the following methodology or other methods approved in writing by the District.

$$\text{Emissions (tons/month)} = \text{Throughput (lb/month)} \times 0.10 \text{ Load Factor} \times (1 - \text{cyclone efficiency}) \times (1 - \text{scrubber efficiency}) / 2000 \text{ (lb/ton)}$$

- iii. The owner or operator shall monitor and record the flow rate of the Wet Scrubber/De-mister at least once per day to ensure it is at or between the following:

Wet Scrubber/De-mister	Range
Nozzle 1	18-24 gpm
Nozzle 2 & 3	8-15 gpm
Nozzle 4 & 5	5-10 gpm

- iv. The owner or operator shall, daily, maintain records of any periods of time where the process was operating and the control device was not operating, or a declaration that the control device operated at all times that day when the process was operating.
- v. If there is any time that the control device is bypassed or not in operation when the process is operating, then the owner or operator shall keep a record of the following for each bypass event:
  - (1) Date;
  - (2) Start time and stop time;
  - (3) Identification of the control device and process equipment;
  - (4) PM emissions during the bypass in lb/hr;
  - (5) Summary of the cause or reason for each bypass event;

- (6) Corrective action taken to minimize the extent or duration of the bypass event; and
  - (7) Measures implemented to prevent reoccurrence of the situation that resulted in the bypass event.
- vi. The owner or operator shall, monthly, perform a visual inspection of the structural and mechanical integrity of the dust collector for signs of damage, air leakage, corrosion, or other equipment defects, and repair and/or replace defective components as needed. The owner or operator shall maintain monthly records of the results.

**S3. Reporting**

[Regulation 2.17, section 5.2]

The owner or operator shall report the following information, as required by General Condition G12:

**a. Opacity**

- i. The owner or operator shall report the following:
  - (1) The date, time and results of each visible emissions survey conducted that resulted in visible emissions being observed;
  - (2) The date, time and results of each Method 9 conducted; and
  - (3) A description of any corrective actions taken.

**b. PM/PM<sub>10</sub>**

- i. The owner or operator shall report the plantwide 12-consecutive month PM<sub>10</sub> emission for each month in the report period.
- ii. The owner or operator shall clearly identify all deviations from permit requirements in the annual report and include the following information regarding bypass events:
  - (1) Emission unit ID number and emission point ID number;
  - (2) Identification of all times any control device was not in operation when associated emission units were operating;
  - (3) Identification of all times any control device exceeds the flow rate range (Nozzles 1, 2, 3, 4, and 5);
  - (4) Calculated lb/hr PM emissions during the bypass event;
  - (5) Reason for excess emissions; and
  - (6) Description of corrective action taken to prevent future exceedances.



**Emission Unit IA1: Natural Gas Combustion****Applicable Regulations**

<b>FEDERALLY ENFORCEABLE REGULATIONS</b>		
<b>Regulation</b>	<b>Title</b>	<b>Applicable Sections</b>
2.17	Federally Enforceable District Origin Operating Permit	All (1-9)
7.06	Standards of Performance for New Indirect Heat Exchangers	All (1-5)

**Equipment**

<b>Emission Point</b>	<b>Description</b>	<b>Install Date</b>	<b>Applicable Regulations</b>	<b>Control ID</b>	<b>Release ID</b>
IA1	Natural gas Boiler 1, make Industrial, model PFDH 150, capacity 6.3 MMBtu/hr	1974	7.06	N/A	N/A
IA2	Natural gas Boiler 2, make Steam Pak, model SPHV 150, capacity 5.0 MMBtu/hr	1976		N/A	N/A

**Control Devices**

There are no control devices associated with this equipment.

## IA1 Specific Conditions

### S1. Standards

[Regulation 2.17, section 5.1]

#### a. Opacity

The owner or operator shall not cause to be discharged into the atmosphere from any affected facility particulate matter emissions which exhibit greater than 20% opacity.<sup>6</sup> [Regulation 7.06, section 4.2]

#### b. PM/PM<sub>10</sub>

- i. The owner or operator shall not allow the plantwide PM/PM<sub>10</sub> emissions to equal or exceed 25 tons per 12 consecutive month period.  
[Regulation 2.17, section 5.1]
- ii. The owner or operator of Emission Point IA1 shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.56 pounds per million BTU actual total heat input.<sup>7</sup>  
[Regulation 7.06, section 4.1.1]
- iii. The owner or operator of Emission Point IA2 shall not cause to be discharged into the atmosphere from that affected facility particulate matter in excess of 0.52 pounds per million Btu actual total heat input.<sup>7</sup> [Regulation 7.06, section 4.1.3]

#### c. SO<sub>2</sub>

- i. The owner or operator shall not allow the plantwide SO<sub>2</sub> emissions to equal or exceed 25 tons per 12 consecutive month period.  
[Regulation 2.17, section 5.1]
- ii. The owner or operator shall not cause to be discharged into the atmosphere from that affected facility any gases that contain sulfur dioxide in excess of 1.0 pounds per million BTU actual total heat input for combustion of liquid and gaseous fuels. [Regulation 7.06, section 5.1.1]

### S2. Monitoring and Record Keeping

[Regulation 2.17, section 5.2]

The owner or operator shall maintain the following records for a minimum of five years and make the records readily available to the District upon request.

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<sup>6</sup> The District has determined that using a natural gas fired boiler should inherently meet the 20% opacity standard.

<sup>7</sup> A one-time compliance demonstration has been performed for PM and SO<sub>2</sub> for the boiler using AP-42 emission factors and combusting natural gas, and the pound per million BTU emission standards cannot be exceeded.

**a. Opacity**

There are no routine compliance reporting requirements.

**b. PM/PM<sub>10</sub>**

- i. The owner or operator shall maintain records of the amount of fuel combusted during each operating month.
- ii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month emissions of PM<sub>10</sub> for each calendar month.

**c. SO<sub>2</sub>**

- i. The owner or operator shall maintain records of the amount of fuel combusted during each operating month.
- ii. The owner or operator shall monthly calculate and record the monthly and consecutive 12-month emissions of SO<sub>2</sub> for each calendar month.

**S3. Reporting**

[Regulation 2.17, section 5.2]

The owner or operator shall report with the following information, as required by General Condition G12:

**a. Opacity**

There are no reporting requirements for this pollutant.

**b. PM/PM<sub>10</sub>**

The owner or operator shall report the plantwide 12-consecutive month PM<sub>10</sub> emission for each month in the report period.

**c. SO<sub>2</sub>**

The owner or operator shall report the plantwide 12-consecutive month SO<sub>2</sub> emission for each month in the report period.

### Insignificant Activities

Equipment	Qty	PTE (ton/yr)	Regulation Basis
Pressure relief valves from cookers to holding tank	4	< 2 tpy SO <sub>2</sub>	Regulation 1.02, Appendix A
Lab exhaust fan from chemical hood	1	< 2 tpy SO <sub>2</sub>	Regulation 1.02, Appendix A
Portable welding torches	2	< 2 tpy PM	Regulation 1.02, Appendix A
Fork lifts, propane powered fork lifts	3	< 5 tpy NO <sub>x</sub>	Regulation 1.02, Appendix A
Small dust collector that removes dust from headspace of 200-gallon tank	1	< 1 tpy PM	Regulation 1.02, Appendix A

1. Insignificant activities identified in District Regulation 1.02, Appendix A, may be subject to size or production rate disclosure requirements.
2. Insignificant activities identified in District Regulation 1.02, Appendix A shall comply with generally applicable requirements.
3. The owner or operator shall annually submit an updated list of insignificant activities that occurred during the preceding year, with the compliance certification due April 15<sup>th</sup>.
4. Emissions from Insignificant Activities shall be reported in conjunction with the reporting of annual emissions of the facility as required by the District.
5. The owner or operator may elect to monitor actual throughputs for each of the insignificant activities and calculate actual annual emissions, or use Potential to Emit (PTE) as the annual emissions for each piece of equipment.
6. The District has determined that no monitoring, recordkeeping, or reporting requirements apply to the insignificant activities listed, except for the equipment that has an applicable regulation and permitted under an insignificant activity (IA) unit.